

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CALEB BARNETT, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	Case No. 3:23-cv-209-SPM
)	
KWAME RAOUL, et al.,)	
)	
Defendants.)	

DANE HARREL, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	Case No. 3:23-cv-141-SPM
)	
KWAME RAOUL, et al.,)	
)	
Defendants.)	

JEREMY W. LANGLEY, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	Case No. 3:23-cv-192-SPM
)	
BRENDAN KELLY, et al.,)	
)	
Defendants.)	

LANGLEY PLAINTIFFS’ EXPERT WITNESS DISCLOSURES

The Langley Plaintiffs submit this Expert Witness Disclosure, with the understanding that supplemental expert witness identification and rebuttal expert witness identification may become necessary as the case proceeds, and in addition to those previously disclosed, :

1. **J. Buford Boone III** heads Boone Ballistics, LLC. He is a retired Supervisory Special Agent of the Federal Bureau of Investigation and was the primary Special Agent with oversight of the FBI's Ballistic Research Facility. Mr. Boone will offer testimony about the ballistics of firearms banned by PICA and their suitability for various lawful purposes, including self-defense.

2. **Paul Leitner-Wise** is a firearm designer, firearm manufacturer, and firearmrelated patent holder. Mr. Leitner-Wise will testify as to the mechanical distinctions between select fire rifles like the M-16 and semiautomatic-only rifles like AR-15 variants that PICA bans.

3. **David A. Lombardo** is the president and founder of SAFER USA, a Chicagobased firearm training school. Founded in October 2006, SAFER USA has trained thousands of students on concealed carry and tactical firearm use. Mr. Lombardo will offer testimony as to the popularity and ubiquity of firearms banned by PICA in self-defense training courses and the utility of those firearms for self-defense and other lawful purposes.

4. **Randy Watt** is the former Chief of Police of the Ogden Police Department. He has a total of 32 years of service as a law enforcement officer, including 12 years in SWAT and 15 years as the primary firearms and defensive tactics trainer in the Training Bureau. He is a published author and a trainer on Police Leadership at various levels in federal, state, and local law enforcement. Mr. Watt will offer testimony as to the popularity and ubiquity of firearms

banned by PICA in self-defense training courses and the utility of those firearms for self-defense and other lawful purposes.

5. **Matthew Little** is a US Army Special Forces combat veteran who has extensive law enforcement experience, including serving as training coordinator and an operational supervisor on a major metropolitan SWAT team and has worked as a government contractor in non-permissive environments. He is also ranked as a master class shooter with pistol and carbine by the US Practical Shooting Association, the Steel Challenge Shooting Association, and the International Defensive Pistol Association. Mr. Little has instructed foreign and US military personnel and police officers, martial artists, and civilians. Mr. Little will offer testimony as to the popularity and ubiquity of firearms banned by PICA in self-defense training courses and the utility of those firearms for self-defense and other lawful purposes.

6. **Jeffrey Eby** reached the rank of Chief Warrant Officer 5, having served 28 years in the United States Marine Corps, including 11 years as a Marine Gunner. He saw combat in Iraq and was the Officer-in-Charge of the USMC Small Arms Instructor Course, which developed the USMC Combat Marksmanship Program. Mr. Eby will offer testimony as to the nature of firearms and ammunition that are used and not used in the military.

7. **Mike Musselman** also reached the rank of Chief Warrant Officer 5, and was an infantryman for 25 years out of 30 total years with the in the United States Marine Corps. He served as a Marine Gunner and an Infantry Weapons Officer and did three combat deployments to Iraq and another in Afghanistan. Mr. Musselman will offer testimony as to the nature of firearms and ammunition that are used and not used in the military.

8. **Daniel G. Kemp**, is a U.S. Army veteran, with deployments to Korea, Kosovo, Iraq, Afghanistan, and was last assigned to the 101st Airborne (Air Assault) Division, and is currently an instructor operating primarily at Fort Campbell, Kentucky, Kemp is a military

firearms collector and a historian, and will offer testimony in the nature of firearms, ammunition, accessories and related items that are currently used in the military, and those that are not, as well as historical military and civilian firearms usage, their development, and their cross over of use and development, as well as their relative effectiveness for armed confrontation, including self defense.

9. Michael Dennis is a retired Chief of Police, and a current licensed FFL gunsmith. Mr. Dennis will offer testimony in the nature of firearms he has used and confronted in his law enforcement career, as well as his knowledge and experience with the effect of gun shot wounds from both his law enforcement career, and his prior career as a paramedic. Mr. Dennis is a firearms instructor, and will express knowledge and opinions on the kinds of firearm useful for self defense, and his observations of same.

Dated: March 28, 2024

Respectfully submitted,

/s/ Thomas G. Maag.

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CERTIFICATE OF SERVICE

I hereby certify that on March 28 2024, an electronic PDF of PLAINTIFFS' COMBINED EXPERT WITNESS DISCLOSURES was uploaded to the Court's CM/ECF system, which will automatically generate and send by electronic mail a Notice of Docket Activity to the following registered attorneys participating in the case:

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Dated: March 28, 2024

*/s/ Thomas G. Maag*_____